

Memo 4/1/82 handwritten

From: David V. Crawford SPFO  
To: Katie Biggs Chief SPFO  
Re: Filtronetics  
6505 Hadley Road  
Roxbury, Mo.

|                        |
|------------------------|
| Site: Filtronetics Inc |
| ID #: MO0980633473     |
| Break: 161             |
| Other:                 |
| 4-82                   |

History

On May 19, 1981 we received an anonymous complaint from ~~an~~ employee of the above firm that the facility was improperly disposing small quantities of hazardous wastes (silver cyanide) by dumping onto the ground surface behind the plant. The complainant also alleged similar disposal methods had been done by the firm at their previous location on Hadley Rd. About 2-3 years ago the firm moved from 6505 Hadley Rd. to their current location in Roxbury of 10012 E. 6<sup>44</sup>th St.

As a result of the anonymous complaint both the current & previous plant location were listed as potential uncontrolled sites. On 2/8/81 ENSV/TECH conducted a RCRA compliance inspection of the current plant on 64<sup>44</sup>th St. This was not a joint uncontrolled site inspection. However I did receive & review a copy of the RCRA compliance inspection report on the 64<sup>44</sup>th St. sit.

Basically the allegations made by the anonymous complainant were verified regarding the 64<sup>44</sup>th St. sit. Filtronetics was found to be dumping small quantities of spent silver cyanide (0.9 oz / 2 months) & ammonium bifluoride (approximately 2 teaspoons <sup>per</sup> ~~per~~ solution) in each batch of etching solution dumped onto the ground behind the building. Several gallons of water are then dumped onto the ground to flush contaminants from the surface.

Status of 64<sup>44</sup>th St. Site

The firm has been advised that the above wastes must be tested to determine if they fail one of the four characteristics & are thus a hazardous waste. Following review of the

In the RCRA Compliance inspection I attempted to evaluate potential adverse effects which may result from the previous dumping at the 64th St. site. My memo of 1/26/82 to Bob Morby, LUMR Chief, concluded that no significant adverse impacts would result, if the dumping is discontinued.

I then advised SWCM of this assessment but recommended that the rather distinct area of soil contamination be removed or covered with clean soil to reduce the potential for a child or other unknowing person to contact or ingest some of the contaminated soil. Consequently SWCM has ~~sent~~ <sup>written</sup> Filtronetics a compliance order requiring that the wastes be tested to determine if they are hazardous & also to remove or cover the contaminated soil at the 64th St. site. However I determined that even if the soil were not removed or covered the probability of an adverse effect to result was so low as not to warrant any additional effort under the uncontrolled site program. Currently we have not yet submitted a final Strategy on the 64th St. site until we find out if the firm will cover or remove the contaminated soil.

### Hadley Road site

Review of various maps of the Paytown ~~area~~ <sup>(sic)</sup> area had not shown any streets identified as Hadley. On the evening of 4/5/82 I was in Paytown on a matter unrelated to EPA or to these sites. While driving through the area I tried to find a Hadley Rd. I finally located a discontinuous street marked as Hadley Rd about 4 blocks east of Paytown Rd.

6505 Hadley Rd is about 5 blocks southeast of 10012 E 64th St., Filtronetics current location. 6505 Hadley Rd is located in a small industrial park, consisting of a single row of about 8-10 buildings sharing common walls. The neighborhood is mixed with light industrial, commercial buildings & single unit residences.

During my investigation of the 64th & site I found ~~did~~  
I was told by city of Payson officials that there were no  
known uses of private wells in the area. All buildings &  
residences are believed to be connected to the public supply.  
While driving through area I saw nothing to contradict  
that assumption. Nowhere within several blocks of #6505  
Hadley did I see any above ground well casings or any  
~~or~~ pit housing casings. If there are any wells in  
the area they are either buried seals or casings in basements.  
Nor did I notice any septic fields in the area.

The small industrial park in which #505 Hadley is  
located is bordered on the east by ~~the~~ residences. However  
there are above (elevation) the industrial park on a small  
but steep hill. Surface water on the site would appear to  
flow from east to west. The areas north & south of  
the industrial park appeared to be vacant for a block  
or more. Hadley Road borders the park on the west.  
Going farther west there is some type of <sup>small</sup> industrial or  
factory building (possibly vacant) & then the railroad.

City of Payson officials earlier reported there is  
a discontinuous storm sewer paralleling the railroad  
which is believed to receive & carry surface run-off to an un-  
named creek. This appeared to be correct to me but I made no  
extensive effort to verify this. The ground west of the industrial  
park is a paved parking lot up to Hadley Rd. Any  
run-off or ~~cont~~ chemicals on the surface of the parking  
lot would have long since been flushed away. It is  
possible that the parking lot was constructed after  
Tiltonetrics left & therefore after the alleged disposal  
of chemicals onto the ground.

D) Recommendation.

~~Altronetics~~ Altronetics is reported to have been located at the Hadley Road site for about the same length of time as at the 64th St. location (about 2-3 years). Consequently, if waste management practices have remained constant or similar the quantities of wastes disposed would be similar. I find the location at Hadley Road no more critical or sensitive than the 64th St. location.

Obviously, since Altronetics has moved they are no longer dumping wastes at Hadley Road. If chemical wastes were dumped by Altronetics at the Hadley Rd location after construction of the parking lot the flushing action of run-off would have certainly diluted the wastes to non-detectable concentrations. If the wastes were dumped onto the ground & then covered with the parking lot the parking lot will prevent any contact or exposure. It is still possible that some chemicals may have again been dumped on the ground which has not been been paved. This circumstance would be even less serious than at the 64th St. location. No wastes have been dumped in the past few years since Altronetics moved allowing more time for dilution of any contaminants.

1. I recommend we classify this site as no action necessary. I have drafted a Final Strategy so that effect & attached it to this memo.

Agree (Perry)

disagree

Comments

2. We have not yet asked for ONSR to conduct a site inspection of the Hadley Rd site. I recommend we not ask for a ENSR site inspection in view of the low potential for adverse impacts to result

Agree (Perry)

disagree

Comments

⑤ 3. In view of the small quantities, the time elapsed & the low potential adverse impacts I do not feel we need to ask for any soil removal or any other remedial actions  
agreed  
disagreed  
Comments